

AO 91 (Rev. 11/11) Criminal Complaint

FILED**UNITED STATES DISTRICT COURT**

for the

Western District of Texas

JUL 31 2024**CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS**BY  **DEPUTY CLERK**

United States of America)

v.)

Gianny Alexandra RAMIREZ-Fernandez)

Case No. **SA:24-MJ-1103**Defendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 30, 2024 in the county of Bexar in the
Western District of Texas, the defendant(s) violated:

*Code Section**Offense Description*

Title 18 U.S. Code 1591

Sex trafficking of children or by force, fraud, or coercion

Maximum Penalties:

Mandatory minimum 10 years, mazimum life imprisonment.
 \$250,00 fine, lifetime supervised release, \$100 mandatory special
 assessment; \$5000 JVTa assessment, Up to \$50,000 under
 2259A restitution, forfeiture, and sex offender registration.

This criminal complaint is based on these facts:

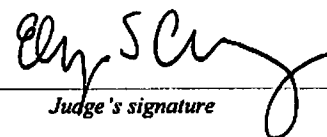
See Attachment A

☒ Continued on the attached sheet.**ROSE M ROJAS** Digitally signed by ROSE M ROJAS
Date: 2024.07.31 11:27:20 -05'00'*Complainant's signature*

Rose Rojas, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 07/31/2024City and state: San Antonio, Texas*Judge's signature*

Elizabeth S. Chestney, U.S. Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Special Agent Rose Rojas, being duly sworn do hereby depose and state:

1. Your affiant is currently employed as a Special Agent (SA) with the Homeland Security Investigations (HSI) and has been so employed since July 2018. Since July 2018, your affiant has participated in investigations concerning violations of Title 18. Having handled all aspects of investigations involving human trafficking, your affiant recognizes the manner and means, the victim-based nuances, and the organizational structure associated with human trafficking.
2. On July 30, 2024, as part of an ongoing investigation into domestic minor sex trafficking, officers with the San Antonio Police Department responded to an internet-based social media post advertising sex for a fee at a motel located on Pastuer Court in San Antonio, Texas, in the Western District of Texas. An undercover officer posing as a customer, aka "a john," contacted the female in the room he was instructed to go to for a sexual encounter in exchange for U.S. currency.
3. As undercover officer approached the motel room, he observed two individuals lingering in the area outside the room that he recognized as "spotters," or associates with the female inside the designated motel room. These two individuals were later identified as the traffickers of the child victim.
4. The female in the designated room was the sole occupant when the undercover entered the room; she was ultimately identified as an undocumented 16-year-old Venezuelan. The child victim told the undercover officer the price for sex was \$180 for fellatio and sexual intercourse.
5. Law enforcement officers and agents with SAPD and HSI interviewed the child victim who stated advertisements of her to engage in sexual activity are placed online and that she is sold for \$100-\$400 for sexual activity lasting between 10 to 60 minutes. The child victim stated all the money she receives in exchange for commercial sex is given to her female girlfriend and a male friend, later identified as Giannys Alexandra RAMIREZ-Fernandez and Nelson Adrian PEREZ-Martinez, also illegal aliens from Venezuela.
6. Following her state and constitutional rights, RAMIREZ-Fernandez agreed to speak to federal agents with HSI. RAMIREZ-Fernandez admitted to trafficking the child victim by using internet-based social media applications accessed with her cell phone which she utilized to post advertisements for commercial sex which would be provided by the child victim. RAMIREZ-Fernandez knows the child victim is 16-years old. She further

admitted the money from child victim's sex acts provide money for food and shelter for all three – the child victim, RAMIREZ-Fernandez, and PEREZ-Martinez.

7. Following his constitutional and statutory rights, PEREZ-Martinez agreed to speak to HSI Special Agents. PEREZ-Martinez stated he stayed with the child victim and RAMIREZ-Fernandez in the motel. PEREZ-Martinez admitted to knowing that the child victim was engaging in commercial sex. PEREZ-Martinez admitted to being present in the motel room during at least one of child victim's sexual encounters as well as waiting outside the room during other sexual encounters until RAMIREZ-Fernandez text messaged him the sexual act was complete.
8. Based on the above facts, your affiant believes there is probable cause that Giannys Alexandra RAMIREZ-Fernandez and Nelson Adrian PEREZ-Martinez, engaged in the federal offense of Sex Trafficking of a Minor, in violation of Title 18, U.S.C. 1591.

ROSE M ROJAS

Digitally signed by ROSE M
ROJAS
Date: 2024.07.31 11:28:32 -0500

Special Agent Rose Rojas
Homeland Security Investigations

SUBSCRIBED AND SWORN TO BEFORE ME THIS 31st DAY OF July, 2024.


HONORABLE ELIZABETH S. CHESTNEY
UNITED STATES MAGISTRATE JUDGE